

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

SUPPLEMENTAL DECLARATION OF
ANDREW HUGHES IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL
DISCOVERY

NOTE ON MOTION CALENDAR:
Wednesday, May 21, 2025

I, Andrew Hughes, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

2. In Plaintiffs' Motion to Compel Discovery, filed April 30, 2025, Plaintiffs cited an April 28, 2025, White House "Report to the President on Protecting Children from Surgical and Chemical Mutilation Executive Summary," in which the White House announced that HHS had "eliminated 215 ... grants" pursuant to "Section 4" of Executive Order 14187, the Denial-of-Care Order. Dkt. #275 p.3. Plaintiffs provided a hyperlink to that report. *Id.*

3. On May 1, 2025, the day after Plaintiffs filed their motion, Defendants' counsel Vinita Andrapalliyal wrote to Plaintiffs' counsel informing them that the cited report "ha[d] been corrected." A true and correct copy of that email is attached hereto as Exhibit O.

4. As a result of this purported correction, which now states the grants were terminated “[c]ompletely independent” from the Executive Orders enjoined by this Court, the language Plaintiffs quoted no longer appears at the hyperlink in their Motion. Accordingly, attached hereto are two versions of the cited Report. Exhibit P is a true and correct copy of the original report as it appeared on April 30, 2025, that I retrieved from the Internet Archive’s Wayback Machine, at <https://web.archive.org/web/20250429131354/https://www.whitehouse.gov/fact-sheets/2025/04/report-to-the-president-on-protecting-children-from-surgical-and-chemical-mutilation-executive-summary/>. Exhibit Q is a true and correct copy of the Report as it appeared on the White House website on May 1, 2025. For ease of the Court’s reference, I have highlighted the changed language.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 1st day of May 2025 at Seattle, Washington.

/s/ Andrew Hughes

ANDREW HUGHES, WSBA #49515

Assistant Attorney General